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8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

9 Hernando Alberto Heredia,

10 Case No. 2:22-cv-01846-RFB-DJA

11 Plaintiff,

12 **Stipulation to Extend Discovery Plan**
and Scheduling Order

13 v.

14 **(Third Request)**

15 United States of America *ex rel.* United
16 States Postal Service,

17 Defendants.

18 The parties stipulate to extend the remaining deadlines in the Stipulated Discovery
19 Plan and Scheduling Order by 30 days. This is the third request to extend the Stipulated
Discovery Plan and Scheduling Order. This extension is requested because the United
States needs additional time to finalize expert reports to Plaintiff.

20 **I. Discovery Completed**

21 The parties have exchanged written discovery in the form of interrogatories and
22 requests for production of documents. The parties have taken depositions of the Plaintiff
23 and the government driver. The United States has subpoenaed 16 medical providers. The
24 United States has received records and imaging from all providers. The United States has
25 made two supplemental disclosures of subpoenaed records it received. Plaintiff has served
26 an expert disclosure.

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II. Discovery Remaining

The United States needs to exchange expert reports. The parties may need to take expert depositions.

III. Why Discovery Has Not Been Completed

The United States recently served its supplemental disclosure with subpoenaed documents from medical providers. The United States needs a short extension of time to consult with its experts and finalize expert reports.

IV. Proposed Deadlines

Close of Discovery: April 29, 2024 (from March 30, 2024)

10 | Initial Expert Disclosures: February 29, 2024 (from January 30, 2024)

11 | Rebuttal Expert Disclosures: April 1, 2024 (from March 2, 2024)

12 | Dispositive Motions: May 31, 2024 (from May 1, 2024)

13 | Joint Pre-Trial Order: June 30, 2024 (from May 31, 2024)

Respectfully submitted this 9th day of January 2024.

JASON M. FRIERSON
United States Attorney

HICKS & BRASIER, PLLC

/s/ Stephen R. Hanson II
STEPHEN R. HANSON II
Assistant United States Attorney

/s/ Betsy C. Jefferis-Aguilar
BETSY C. JEFFERIS-AGUILAR
Attorney for Plaintiff

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: 1/10/2024